

**FILED**  
12/7/2021**21CR50064**THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	No.
vs.	)	Violations: Title 18, United States
	)	Code, Sections 1111(a) and (b); 1117;
BRANDON SIMONSON,	)	249(a)(1)(B)(i); 113(a)(6) and
also known as "Whitey," and	)	(b)(2)
KRISTOPHER MARTIN,	)	
also known as "No Luck"	)	

**COUNT ONE**

The SPECIAL APRIL 2021 GRAND JURY charges:

1. At times material to this Indictment:
  - a. The United States Penitentiary Thomson ("USP Thomson") was a United States Bureau of Prisons facility located in Thomson, Illinois.
  - b. The defendants Brandon Simonson, also known as "Whitey," and Kristopher Martin, also known as "No Luck," were inmates at USP Thomson.
  - c. Matthew Phillips was an inmate at USP Thomson.
2. On or about March 2, 2020, in the Northern District of Illinois, Western Division, at USP Thomson, a place within the special territorial jurisdiction of the United States,

BRANDON SIMONSON,  
also known as "Whitey," and  
KRISTOPHER MARTIN,  
also known as "No Luck,"

defendants herein, with malice aforethought, did unlawfully kill Matthew Phillips;

In violation of Title 18, United States Code, Sections 1111(a) and (b).

COUNT TWO

The SPECIAL APRIL 2021 GRAND JURY further charges:

1. At times material to this Indictment:
  - a. The defendants were part of a white supremacist group called the Valhalla Bound Skinheads ("VBS").
  - b. The defendants espoused white supremacist views and possessed various Nazi memorabilia and other items symbolizing white supremacy including, but not limited to, letters, articles, and literature supporting and promoting VBS and white supremacy, a cup with a swastika engraved on it, drawings of Adolph Hitler, and prison shoes with the numerical symbols "88" and "14."
  - c. The defendants had tattoos showing their allegiance to VBS.
  - d. The defendants believed that Matthew Phillips was Jewish.
2. On or between October 2019 and March 2020, in the Northern District of Illinois, Western Division, at USP Thomson, a place within the special territorial jurisdiction of the United States,

BRANDON SIMONSON,  
also known as "Whitey," and  
KRISTOPHER MARTIN,  
also known as "No Luck,"

defendants herein, did knowingly and willfully conspire and agree with each other to kill, with malice aforethought, Matthew Phillips, in violation of Title 18, United States Code, Section 1111.

**Overt Acts**

3. In furtherance of and to affect the object of the conspiracy, defendants performed and caused to be performed the following overt acts in the Northern District of Illinois:

a. The defendants agreed to assault Matthew Phillips because of Matthew Phillips' actual and perceived race and religion, namely, Jewish.

b. The defendants taunted and ridiculed Matthew Phillips because of his actual and perceived race and religion, namely, Jewish.

c. On March 2, 2020, defendant Martin told another inmate, Individual A, that defendants Simonson and Martin were going to "get" Matthew Phillips and that Individual A should not interfere.

d. On March 2, 2020, defendant Simonson removed his coat prior to attacking Matthew Phillips.

e. On March 2, 2020, the defendants continuously struck Matthew Phillips in the upper body, face, and head despite Matthew Phillips being defenseless and despite verbal commands by correctional officers to stop.

All in violation of Title 18, United States Code, Section 1117.

**COUNT THREE**

The SPECIAL APRIL 2021 GRAND JURY further charges:

On or about March 2, 2020, in the Northern District of Illinois, Western Division, at USP Thomson, a place within the special territorial jurisdiction of the United States,

BRANDON SIMONSON,  
also known as "Whitey," and  
KRISTOPHER MARTIN,  
also known as "No Luck,"

defendants herein, did willfully cause bodily injury to Matthew Phillips because of Matthew Phillips' actual and perceived race and religion; specifically, the defendants assaulted Matthew Phillips because they perceived Matthew Phillips to be Jewish. The offense resulted in bodily injury to, and the death of, Matthew Phillips, and included an attempt to kill.

In violation of Title 18, United States Code, Section 249(a)(1)(B)(i).

**COUNT FOUR**

The SPECIAL APRIL 2021 GRAND JURY further charges:

On or about March 2, 2020, in the Northern District of Illinois, Western Division, at USP Thomson, a place within the special territorial jurisdiction of the United States,

BRANDON SIMONSON,  
also known as "Whitey," and  
KRISTOPHER MARTIN,  
also known as "No Luck,"

defendants herein, did knowingly assault Matthew Phillips and cause serious bodily injury to Matthew Phillips;

In violation of Title 18, United States Code, Section 113(a)(6) and (b)(2).

A TRUE BILL:

FOREPERSON

  
UNITED STATES ATTORNEY